

REMARKS

In response to the Official Action mailed July 13, 2004, Applicants amend their application and respectfully request reconsideration. In this Amendment, no claims are added or canceled so that claims 1-39 remain pending. No new matter has been added.

Claims 3, 20, 21 and 32 are amended to correct typographical errors. Claims 1, 19, and 38 are amended to specifically recite that a bitmap brush is a virtual paint brush specified by a bitmap image (see page 1, lines 13-16; page 3, lines 5-6; and Figures 2-5 of the patent application).

The Official Action rejected claims 1-39 as anticipated by Collins (US Patent 6,173,075). That rejection is respectfully traversed.

Collins cannot anticipate the invention because Collins fails to teach a bitmap brush that is a virtual paint brush specified by a bitmap image. Collins teaches nothing remotely similar to such a virtual paint brush, and thus provides nothing that could be reasonably interpreted as the claimed bitmap brush. Accordingly, Collins cannot teach *determining a first segment in a bitmap brush* corresponding to a first polygon on a guideline, or *applying a transformation to a bitmap image mapped in the first segment of the bitmap brush* to generate a corresponding bitmap image on the guideline, since the claimed bitmap brush is not present in Collins.

Thus, Collins fails to teach every limitation of claims 1, 19, and 38. Accordingly, the rejection is erroneous and should be withdrawn.

Regarding claims 7-8 and 25-26, Collins fails to teach a bilinear transformation. The Official Action contends that “the weighted average is the bilinear transformation step.” Applicants argued that the binary transformation is distinctly defined in the specification at page 24, lines 4-14 of the patent application. Clearly, a weighted average is not a bilinear transformation as defined within the scope of this application. The Advisory Action dated December 16, 2004, responds by stating that the argument is not persuasive because the claims “do not claim the specific bilinear filtering set forth by the applicants [*sic*] specification.” However, that does not change the fact that calculating a weighted average is simply not a “bilinear transformation” under any meaning of that term, whether ordinary or specifically provided by the specification. Accordingly, the rejection of claims 7-8 and 25-26 is erroneous and should be withdrawn.

Moreover, the rejection of claims 2-18, 20-37, and 39 is dependent upon the propriety of the rejection of claims 1, 19, and 38. Because those rejections are erroneous, the rejection of claims 2-18, 20-37, and 39 should also be withdrawn.

In re Appln. of BRONSKILL et al.
Application No. 09/602,044

Reconsideration and withdrawal of the rejection are earnestly solicited.

Respectfully submitted,



A. Wesley Ferreebee, Reg. No. 51,312
LEYDIG, VOIT & MAYER
700 Thirteenth Street, N.W., Suite 300
Washington, DC 20005-3960
(202) 737-6770 (telephone)
(202) 737-6776 (facsimile)

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Amendment or ROA - Regular (Revised 9/03/03)